

EXHIBIT V

to

PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Civil Action No.: 1:10-cv-00986-JFA

Communications denying privileges



3651 Wheeler Road
Augusta, Georgia 30909
(706) 651-3232

www.doctors-hospital.net

January 8, 2009

Margo J. Hein-Muniz, MD
170 Waters Edge Drive
Aiken, SC 29803

RE: Request for Consideration of Application to the Medical Staff at Doctor Hospital

Dear Dr. Hein-Muniz,

As you are probably aware, our Credentialing Processing Center has not received verification of two affiliations listed on your application. One is with Aiken Regional Medical Center and the other is Parkside Women's Center.

According to the Medical Staff Bylaws of Doctors Hospital, Article III, Medical Staff Membership 5.B. and 5.C (see excerpt below) applications can only be deemed complete when all supporting material has been transmitted. Also noted in the bylaws is that all incomplete Medical Staff application remaining incomplete beyond six months shall automatically be removed from consideration.

An application will be deemed complete when collection and verification of documents outlined in Article III, Sections 5.B. and 5.C. have been accomplished. When complete, the application and supporting material shall be reviewed and analyzed by the Chairperson of each appropriate Department in which the applicant is requesting privileges. The application and supporting material shall be transmitted by the Department Chairperson to the Credentials and Qualifications Committee, who shall review and analyze, and investigate the character, qualifications and professional standing of the applicant. Incomplete Medical Staff applications remaining incomplete beyond six months shall be automatically removed from consideration.

According to our records, the six month time frame will end effective January 30, 2009 and your application will be withdrawn from consideration on that date. This is not a reportable event to the National Practitioner Databank and you may reapply after January 30th.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Shayne George". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

C. Shayne George, CEO/President
Doctors Hospital of Augusta

cc: Fredia Layton, Director, CPC
cc: Marie Hamlet, Chief Operating Officer, CPC

CONFIDENTIAL

MUNIZ_001992

HCA

Hospital Corporation of America

Credentialing Processing CenterProviding Credentialing Services for
HCA Affiliated Hospitals**Fax***Urgent!*

To :

Margo Hein-Muniz, MD

From :

HCA Credentialing Processing

Credentialing Specialist

Phone (904) 688 - 6107

Fax (904) 688 - 7107

Fax : (803) 649-6347

Date : 11/07/2008

Phone :

Pages : 5 (including cover page)

Re : Margo Hein-Muniz, MD

CC :

☒ Urgent☐ For Review☐ Please Process☐ Please Reply☐ Please Comment

Dr. Hein-Muniz,

I am working on getting you Temporary Privileges at Doctor's Hospital of Augusta. Attached is a new Authorization and Release that I need you to sign and date. Unfortunately Aiken Medical Center won't honor the original one because that say they want a current date and that one was dated in July. Also on pages 7 & 8 of your application I need you to initial where you had errors and scratched out.

Please return to me as soon as possible. I can't get you temporary privileges with out these items. If you have any questions feel free to give me a call at (904) 688-6107. Have a great day!

*Thanks!**Paula J. Wray*

HCA Healthcare Credentialing Process Center

Shared Services Center-Orange Park

335 Crossing Blvd

Orange Park, Florida 32073

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Shared Services Center - Orange Park
335 Crossing Blvd., Orange Park, FL 32073

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From: Margo Muniz [mailto:margomuniz@gmail.com]
Sent: Thursday, November 18, 2010 12:38 PM
To: pstrosnider@cmc-sc.com
Cc: Dick, David C.; dplusjx3@aol.com
Subject: application
Importance: High

Hi there! I hope things are well for you. The matter of my privledges still remains unreinstated. It is being held in limbo at the board of Governeor level. Since the matter is unlikely to be resolved in a timely matter, I would request for you to withdraw my application. Thank you for the opportunity to visit your fine hospital, it is unfortunate that I could not be a part of your team. Have a safe and happy holiday.
Thank you,

Margo Muniz, M.D., R.Ph.

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From: Margo Muniz [mailto:margomuniz@gmail.com]
Sent: Tuesday, September 28, 2010 7:04 PM
To: 'Sonja.Klinke@HCAhealthcare.com'
Subject: RE:

Thank you for the information. I will discuss this with my attorneys and see what they think. I will keep you posted. In the meantime, I would like to thank you and every one at Doctor's for the support and phone calls of support. Some of your doctors have called and shared their concern and well wishes, and I haven't even met them yet! I really appreciate it.
P.S. Thank you for the copy of the bylaws, the format is very nice. It reads like a little computer book.
I will keep you abreast of the situation.
Thank you again,

Margo Muniz, MD, R.Ph.

From: Sonja.Klinke@HCAhealthcare.com [mailto:Sonja.Klinke@HCAhealthcare.com]
Sent: Tuesday, September 28, 2010 4:47 PM
To: margomuniz@gmail.com
Cc: magnollamedical@bellsouth.net
Subject:

Dear Dr. Muniz,
I'm sorry that I have not gotten back with you sooner. I quite frankly can't give you a clear answer to your question regarding the addendum you had proposed sending to HCA's credentialing center. It is probably best to compose a letter that would help explain the current situation along with any documents your lawyer will release and I could have the documentation reviewed and evaluated by HCA's corporate office. Please let me know if you have any questions.
Thanks, Sonja

I've attached our medical staff bylaws for your review. Thanks, Sonja

Sonja Deckelman-Klinke, CPCS, CPMSM
Manager, Medical Staff Services
Doctors Hospital
3651 Wheeler Rd.
Augusta, GA 30909
(706) 651-6105 phone
(706) 651-6774 fax
sonja.klinke@hcahealthcare.com

www.doctors-hospital.net

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MUNIZ_001866



----- Original Message -----

From: pamela.torres-pate@weatherbylocums.com

To: gogimuniz1@bellsouth.net

Sent: Tuesday, January 12, 2010 11:03 AM

Subject: Weatherby Locums- Credentialing

Good Morning Dr Hein-Muniz,

I am in the process of credentialing your file and I need your assistance with one thing. As part of the credentialing process, we need to get hospital privilege verifications from your hospitals. I sent the form over to Aiken Medical Center and I was told that they will not give the verification without a more current release. I did originally fax it over to them 10/6/2009 and the release was dated 9/16/2009. I have attached a blank release and if you could please just sign, date and return it I would greatly appreciate it. Please let me know if there is anything else that you need.

Thank you,

Pamela Torres-Pate | Medical Staff Coordinator

Weatherby Locums

6451 N. Federal Highway, Suite 800 | Fort Lauderdale, FL 33308

Direct: 954-343-3011 | Office: 800-586-5022 ext.3011 | Fax: 800-603-6984

Email: pamela.torres-pate@weatherbylocums.com

<http://www.weatherbylocums.com> | [Apply Online](#)

"This is a commercial email from Weatherby Locums, Inc.

If you do not want to receive future emails from Weatherby please reply to the sender and ask to be removed from our list."

----- Original Message -----

From: Copeland, Christel
To: Margo Muniz
Cc: Amy Schultz
Sent: Monday, May 17, 2010 12:54 PM
Subject: application

Dr. Muniz, I am sure that Amy told you that we will not be able to get your privileges approved this month. Because of your suspension from Aiken, your application will have to be submitted for approval through our full Board of Trustees (this is in accordance with our policy). The full Board only meets quarterly so their next meeting is not until the end of July. Our CEO has asked me to make sure that you are aware that if the Board denies approval of your application, this will be reportable to the National Practitioner's Data Bank. With this in mind, you may want to consider withdrawing your application until matters are resolved with Aiken.

Should you wish to continue with applying for privileges, I am still waiting for one response from Todd Fields at the Surgery Center of Aiken. I have faxed three requests for verification (4/27, 5/4 and 5/10) but have not received a response. Once this is received, we can forward your application to the next Credentials meeting, which is scheduled for June 10. FYI, the Credentials Committee is the first step in the approval process.

Please call me if you have any questions.

Christel Copeland

Christel Copeland
Medical Staff Coordinator/Director
Carolina Pines Regional Medical Center
1304 West Bobo Newsom Highway
Hartsville, SC 29550
843-339-4670
843-339-4899 fax
christel.copeland@hma.com

Visit our website @ <http://www.cprmc.com>

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From: trish.reinhardt@comphealth.com
Date: Tue, 9 Mar 2010 11:33:22 -0700
To: <margomuniz@gmail.com>
Subject: Our converstaion

Dr Muniz

Per our conversation please contact me when your privileges have been re instated or the matter has been resolved. Thank you and look forward to working with you in the future. Thanks!

Trish Reinhardt
Staffing Consultant
CompHealth

CompHealth Locum Tenens
c/o OB/GYN
P.O. Box 713100
Salt Lake City, UT 84171-3100

trish.reinhardt@comphealth.com
obgyn.comphealth.com
perinatal.comphealth.com
Phone 1-800-328-3067
Cell 1-801-518-1190
Direct 1-801-930-3528
Fax 1-801-930-4511

*****Ask about our \$1000 referral Bonus*****

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MUNIZ_001827

----- Original Message -----

From: Raiford, Donna

To: Margo Muniz

Sent: Monday, March 08, 2010 5:22 PM

Subject: RE: Privileges

Dr. Muniz, the Credentials Committee meets every month--your application came after the one in Jan and not soon enough before the one in February. Notice of your application goes to the department (OBGYN) and is brought up at their quarterly meeting which was SUPPOSED to meet in April but has been moved up to this Thursday because of Master's week. (great luck!) So, your application should go to Credentials April 13, to MEC on the 19th, and to the Board on the 27th. [all the "stuff" is due by Apr 9th] I did speak to Ruth and she is working frantically to get your information together--not something you cannot do overnight!!

Many Thanks,

Donna N. Raiford, MSC | Medical Staff Office | Trinity Hospital of Augusta

2260 Wrightsboro Road | Augusta, GA 30904-7426 | Ph: 706-481-7749 | Fax: 706-481-7812

donna.raiford@trinityofaugusta.com

From: Margo Muniz [mailto:margomuniz@gmail.com]

Sent: Monday, March 08, 2010 5:00 PM

To: Raiford, Donna

Subject: Re: Privileges

Ok. Did you get the stuff from Ruth at Richland? When is the committee meeting, and when is all the stuff due. Let me know if anything else is missing. Thanks. Margo

----- Original Message -----

From: Raiford, Donna

To: Margo Muniz

Sent: Monday, March 08, 2010 4:23 PM

Subject: RE: Privileges

Send whatever you think will be beneficial--but you have plenty of time.

Many Thanks,

Donna N. Raiford, MSC | Medical Staff Office | Trinity Hospital of Augusta

2260 Wrightsboro Road | Augusta, GA 30904-7426 | Ph: 706-481-7749 | Fax: 706-481-7812

donna.raiford@trinityofaugusta.com

From: Margo Muniz [mailto:margomuniz@gmail.com]

Sent: Monday, March 08, 2010 4:09 PM

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Margo Muniz

On Jun 21, 2010 5:19 PM, "Jason Spiece" <Jason.Spiece@merritthawkins.com> wrote:

> Dr. Muniz,
> That is great news! I am glad it went well. They are without a doubt,
> very interested in you. Jasper is truly one of my favorite places to
> recruit to because the physicians and the Hospital administration are
> just outstanding people.
> To expedite the next steps in helping you secure the position (and
> cancel other interviews), I want you to send me a formal email that I
> can forward on to everyone. Since there are a handful of people involved
> in the recruitment process, I have found if I have very straight-forward
> email from my physician explaining their intentions it helps speed up
> the process in stopping their search and getting a contract drafted.
> I would use your last email, but I think I need something more formal
> to forward on to everyone. Send me a simple email explaining that "The
> site visit went great, and that you and your family have made the
> decision to stop your search for a practice and focus on coming to
> Jasper. That you are ready to accept the position pending the review of
> the contract and your ability to get an AL medical license".
> The email you send me will serve as a "Letter of Intent", so if you
> are not ready to make that commitment, please don't feel obligated to
> send me an email.

>
>
>
>
> Jason Spiece
> Senior Recruiter
> Merritt Hawkins
> an AMN Healthcare Company
> Toll Free: (800) 306-1330
> Direct Dial: (770) 481-1156
> Cell Phone: (404) 202-9727
> Direct Fax: (770) 481-1115
> 7000 Central Parkway NE
> Suite 850
> Atlanta, Georgia 30328
> www.merritthawkins.com

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MUNIZ_001835

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From: Margo Muniz [mailto:margomuniz@gmail.com]
Sent: Tuesday, May 17, 2011 4:08 PM
To: Preston Strosnider
Cc: Dick, David C.
Subject: Re: Medical Staff application at Conway

Margo Muniz

On Oct 7, 2010 11:32 AM, "Preston Strosnider" <PStrosnider@cmc-sc.com> wrote:

> Dr. Muniz:

>

>

>

> Per our discussion a few months ago, CMC's Medical Staff office has not
> acted upon your medical staff application while waiting for a final
> decision of the Fair Hearing process you were the subject of. Recently
> Dr. Dode Washington informs me that your Fair Hearing has concluded and
> the final decision was to sustain your privilege loss. After discussion
> with Dr. Washington, it would appear that you will not be invited to
> join her practice. If this is true, would you consider voluntarily
> withdrawing of your application for Medical Staff membership?

>

>

>

> I cannot not officially speak for the Credentials Committee, but I am
> rather sure that your application for membership may be met with
> resistance. Please let me know of your current status and how you would
> like the Medical Staff office to proceed. If you still wish to pursue
> membership please be prepared to provide an address in Horry County
> where your practice will be located and the name(s) of OB/Gyn physicians
> on CMC's medical staff who would be covering your patients during times
> of your non-availability.

>

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> Please feel free to give me a call should you have any questions
> regarding this matter (843-234-5174).

>

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> Stro

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> Preston Strosnider, DO, MS

>

> VPMA, Conway Medical Center

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MUNIZ_001838